

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	CASE NO. 18 B 21260
Erica A Bryant,	)	HONORABLE Pamela S. Hollis
DEBTOR	)	CHAPTER 13

**NOTICE OF MOTION**

To: Glenn B Stearns, 801 Warrenville Road Suite 650, Lisle, IL 60532;

See attached Service List via U.S. Mail.

Please take notice that on May 10, 2019, at 10:45 a.m., I shall appear before the Honorable Pamela S. Hollis in Joliet City Hall, 150 West Jefferson Street, 2<sup>nd</sup> Floor, Joliet, IL 60432 and present the attached Motion and you may appear if you so choose.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he sent this notice and the attached motion on April 16, 2019, to:

The Chapter 13 Trustee listed above via electronic notice;

To the attached service list via U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Michael Spangler  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 South Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625

Label Matrix for local noticing  
0752-1  
Case 18-21260  
Northern District of Illinois  
Eastern Division  
Tue Apr 16 15:19:59 CDT 2019

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

BRIDGECREST  
PO Box 53087  
Phoenix, AZ 85072-3087

Bridgecrest Credit Company, LLC  
PO BOX 29018  
PHOENIX, AZ 85038-9018

CHASE AUTO  
P.O. BOX 901003 CREDIT BUREAU DISPUTE PR  
FORT WORTH, TX 76101-2003

COMENITYBANK/VICTORIA  
220 W SCHROCK RD  
WESTERVILLE, OH 43081-2873

CREDITORS DISCOUNT & A  
415 E MAIN ST  
STREATOR, IL 61364-2927

Capital One, N.A.  
c/o Becket and Lee LLP  
PO Box 3001  
Malvern PA 19355-0701

DIVERSIFIED CONSULTANT  
10550 DEERWOOD PARK BLVD  
JACKSONVILLE, FL 32256-0596

HYUNDAI CAPITAL AMERIC  
10550 TALBERT AVE  
FOUNTAIN VALLEY, CA 92708-6032

Illinois Tollway  
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KOHL'S/CAPONE  
PO BOX 3115  
MILWAUKEE, WI 53201-3115

MERCHANTS CREDIT GUIDE  
223 W JACKSON BLVD # 700  
Chicago, IL 60606-6914

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

T Mobile/T-Mobile USA Inc  
by American InfoSource as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

U S DEPT OF ED/GSL/ATL  
PO BOX 2287  
ATLANTA, GA 30301-2287

US Department of Education  
P O Box 16448  
St Paul, MN 55116-0448

Verizon  
by American InfoSource as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

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219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Jefferson Capital Systems, LLC  
PO Box 7999  
St Cloud, MN 56302-9617

(d) JEFFERSON CAPITAL SYSTEMS LLC  
PO Box 7999  
St Cloud MN 56302

Portfolio Recovery Associates, LLC  
Successor to CAPITAL ONE BANK (USA) N.A.  
POB 41067  
Norfolk, VA 23541

End of Label Matrix  
Mailable recipients 24  
Bypassed recipients 0  
Total 24

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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DEBTOR.	)	

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Erica A Bryant, by and through Debtor's attorneys, The Semrad Law Firm, LLC and hereby moves this Honorable Court to modify the Chapter 13 Plan, and Debtor states the following:

1. On July 30, 2018, the Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On September 21, 2018, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The confirmed Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 10% of their allowed claims.
4. The confirmed Chapter 13 Plan requires the Debtor to make payments to the Chapter 13 Trustee in the amount of \$500.00 on a monthly basis for 36 months.
5. Debtor fell behind on her payments because she lost her full-time job. As a result, Debtor accrued a default with the Chapter 13 Trustee plan payments.
6. Debtor is now back to work full-time and is in a position to resume making payments going forward.
7. Debtor is seeking to defer the current default to the end of the plan.
8. Debtor respectfully requests this Honorable Court to defer the current plan default to the end of the plan.

9. Debtor has filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, Debtor prays this Honorable Court for the following relief:

- A. To modify the Debtor's Chapter 13 Plan in order to defer the current plan default to the end of the plan;
- B. For any further relief as the Court may deem fair and proper.

Respectfully submitted,

/s/ Michael Spangler  
Attorney for Debtor

The Semrad Law Firm, LLC  
Attorney for Debtor  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625